

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BERNADETTE WILLIAMS, IVAN
SERRATA REYES, ROSILYN WILSON,
LINDA LEWIS, HAUNANIMAE
CERVANTES-WHITE, MARIA MUÑOZ,
TRACY O'BRIEN, KIMBERLY BENSON,
ROY TUINSTRA, MICHELLE SNYDER,
PATRICIA COUCH, SABRINA CAPERS,
WILLIAM ROSS DEAN, RICHARD
DACHEFF, KRISTY KELLER, JASIMEN
HERNANDEZ, EDGAR FLORIAN,
MICHAEL GROSSBERG, MERRILL
LOVE, DIANE NEWKIRK, SANDRA
SMILING, DAVEY JOHNSTON,
CYNTHIA ROEMER, ROQUE
ESPINOZA, and DJ NEILL, TYSON
DEWSNUP, and DEIRDRE PALMER, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE CO.,

Defendant.

Case No.: 1:22-cv-01422

Judge Virginia M. Kendall.

**[PROPOSED] ORDER GRANTING DEFENDANT'S MOTION TO COMPEL
AND FOR DISCOVERY SANCTIONS**

The Court has reviewed Defendant's Motion to Compel and for Discovery Sanctions. The Court **GRANTS** the Motion. This order compels Plaintiffs to comply fully with their discovery obligations and the ESI Protocol Order to search for, collect, and produce responsive documents, including potentially responsive electronic communications, such as emails. Following Plaintiffs' supplemental production of documents, this order compels the already-deposed Plaintiffs to appear for additional depositions not to exceed two hours, with Plaintiffs bearing the cost of court reporters and videographers. Plaintiffs are further ordered to reimburse State Farm for the reasonable court reporter and videographer expenses incurred for the first two deposition attempts of Plaintiff Couch.

Dated this ____ day of _____, 2024

UNITED STATES DISTRICT JUDGE